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October 30, 2023

VIA ECF

Honorable Brian Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Justin Sherwood v. City of New York, et al., 22-cv-7505 (BC)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York, Officer Reis, and Officer Sturman. Defendants write to respectfully request a three day extension of time, from October 30, 2023 to November 2, 2023, to file their opposition to plaintiff's motion to de-designate certain law enforcement disciplinary files from being designated as "Confidential," and a corresponding extension for plaintiff's reply from November 6, 2023 to November 10, 2023. See ECF No. 68. This is the first such request, to which plaintiff consents.

The undersigned apologizes for the delay in filing this request. This request is necessary for multiple reasons. The undersigned was away last week on a pre-scheduled vacation. While I had prepared to work while on vacation in order to meet deadlines, I unexpectedly had limited internet access, which limited the ability of the undersigned to prepare a response to plaintiff's motion. Additionally, this request is necessary in light of other ongoing case commitments to which the undersigned is assigned, including Nunez, et al. v. City of New York, et al., 11-cv-5845, pending before Judge Swain in S.D.N.Y. Further, this extension of time would cause no prejudice to plaintiff, as defendants note that the case has been dismissed with prejudice following settlement.

Thank you for your consideration herein.

Respectfully submitted,

/s/
John Schemitsch
Senior Counsel

cc: **VIA ECF**
All Counsel of Record